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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
GOOGLE TO SUBMIT DECLARATION  
IN SUPPORT OF PLAINTIFFS' MOTION  
TO SEAL (DKT. 360)**

Judge: Honorable Susan van Keulen

Pursuant to Civil Local Rule 6-2, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on December 20, 2021, Plaintiffs filed their Administrative Motion to Seal Documents Pursuant to Dkt. 358 (Dkt. 360).

WHEREAS, on December 26, 2021, Google received unredacted copies of Plaintiffs’ unredacted documents and transcript excerpts cited in Dkt. 357 under seal and submitted with Dkt. 360;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the Designating Party, to establish that such designated material is sealable, is by Monday, December 27, 2021;

WHEREAS, the Parties agree that an extension of time of 7 days will provide Google with sufficient to submit its declaration in support its designated material in the filings (Dkts. 357, 358, 360);

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 360), to January 3, 2022.

DATED: December 27, 2021

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 360). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: December 27, 2021

By /s/ Andrew H. Schapiro  
Andrew H. Schapiro  
*Counsel on behalf of Google*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 360) shall be extended to January 3, 2021.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

\_\_\_\_\_  
Hon. Susan van Keulen  
United States Magistrate Judge